

ARM Group LLC

Engineers and Scientists

November 16, 2021

Ms. Barbara Brown
Project Coordinator
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Comment Response Letter:
Parcel B13 Corrective Measures Study
Report (R1)
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is pleased to provide the following response to comments provided by the Maryland Department of the Environment (MDE) via email on October 25, 2021 regarding the previous submission of the Corrective Measures Study (CMS) Report (Revision 1, dated September 17, 2021) for Parcel B13 (the Site) of the TPA property located in Sparrows Point, Maryland.

The Corrective Measures Study Investigation Report has been revised and is provided accompanying this Comment Response Letter. Responses to the MDE comments are given below; the original comment is included in italics with the response following.

1. Using a geomembrane layer and 4" of industrial clean fill as a cap can only be considered an interim measure. This is not a permanent impervious cap and should be identified as such in the CMS. Details of how this area will be clearly demarcated to prevent any possibility of accidental breach of the interim cap must be provided as part of the interim measure plan (i.e., fencing).

Section 6.2.4 specifies that the cap is considered an interim measure, pending future development plans for the Site. Signage will be installed on all sides of the consolidation area that state:

No Digging Allowed

Contact TPA Environmental if any Digging or Excavation is Required

TPA Contact Number (443) 649-5073

2. Low-permeability and impermeable are used interchangeably in sections of this report. Correct to use one description of the proposed cap.

Report language has been revised to reflect that the proposed 10-mil polyethylene liner cap will be considered impermeable.

3. Pg. 13 Reduction in Toxicity...

Why would Alternatives 1 and 2 eventually reduce waste mobility through capping? Why is there no consideration of remediation of naphthalene contamination once the IM is installed? Vapor extraction could be considered to reduce contaminants in the slag material once it is placed.

Alternatives 1 and 2 specify disposal in a landfill that will eventually be closed/capped. This closure would reduce waste mobility. Capping measures will limit infiltration, thereby reducing cross-media transfer risk. In 2020, a material handling odor control test (BioSolve Pinkwater) was conducted which required excavating into the side of one of the naphthalene impacted piles. This test exposed the internal stockpile and the ground below the stockpile. No leaching of product from the pile was observed during this test. Based upon these observations, remediation of the naphthalene impacted soil/vapor extraction does not appear to be necessary for cleanup objectives to be met.

4. Section 6.2.3 - In the event that NAPL is identified in highly odiferous slag, how would it be handled off-site? Be specific. Define off-site.

In the event NAPL is identified in the slag it will be characterized to evaluate potential disposal options. Based upon previous investigations performed in this area, it is anticipated that the slag would not be considered a RCRA hazardous waste. If off-site disposal is determined to be the best solution, a 3rd party subcontracted offsite facility would be identified (not on TPA property) that would accept the material. TPA would work closely with the selected offsite facility to coordinate characterization, shipping, and disposal. If odors produce a potential public nuisance during transport of the material, then the loads could be covered with 6 to 12 inches of clean fill or sprayed with Posi-Shell® or similar to minimize odors.

5. Section 6.2.4 - What is the proposed source of “approved” fill for this cap?

Reclaimed slag from elsewhere on Parcel B13 is proposed as the fill material that will be used in the interim cap. This slag will undergo the typical screening required of all reclaimed material within the Parcel.



6. Section 6.2.6 - This section should mention maintenance and inspection requirements for the interim cap.

Language has been added to this section to specify that the interim cap will be maintained and inspected. Inspection of the interim capping remedy will be conducted monthly, with maintenance records maintained for MDE inspection.

7. Cross-Sections: It appears that there is still a significant amount of slag material above the proposed final grade of this area that needs to be removed to expose the proposed slag reuse area. Provide more details about how material is planned to be moved in step by step stages. Add any sampling results that exist for slag material above the naphthalene contaminated area to the cross sections, where appropriate, to show that the material remaining for processing has been investigated and is not expected to contain additional contaminated material

The slag material above final grade is in the process of being recovered. The process being implemented in moving the material is:

- Mark out the area of the proposed excavation
- Excavate from the northeast corner of the proposed area towards the southwest bringing the pile down to the proposed grade (approximately 4 feet above mean seal level/ approximately 3 feet above the ground water table).
- Leave the defined impacted area (source area) intact as we prepare the excavated cell.
- While excavating, have a full-time environmental professional on-site screening the material during recovery. Screening will include visual, olfactory and hand-held PID measurements.
- If impacted material is encountered during excavation that has either a PID concentration in excess of 10 ppm or exhibits a noticeable odor it will be segregated/consolidated and clean cover will be placed on top of it as necessary to minimize any potential odor issues.

This area was previously characterized with soil boring and test pits. The PID screening results from these programs are included as **Appendix C**, and notes have been added to the cross sections.

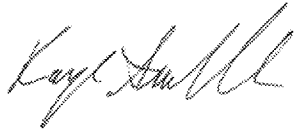
8. Provide specific details on the liner that is proposed to be installed.

A 10-mil polyethylene liner is proposed to be installed above the affected material that will be placed in the cell.

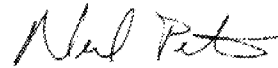


If you have questions regarding any information covered in this document, please feel free to contact Peter Haid at Tradepoint Atlantic: 443-649-5055.

Respectfully Submitted,
ARM Group LLC



Kaye Guille, P.E., PMP
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